

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

PROVINCE LAKE GOLF ENTERPRISES, INC. and PLG HOLDING LLC, Plaintiffs,	:	C.A. NO.: 1:20-cv-00309
	:	
VS.	:	
	:	
PHILADELPHIA INDEMNITY INSURANCE COMPANY,	:	APRIL 3, 2020
	:	
Defendant.	:	

**MOTION FOR EXTENSION OF TIME TO  
RESPOND TO AMENDED COMPLAINT**

Defendant, Philadelphia Indemnity Insurance Company, through the undersigned counsel, pursuant to Fed. R. Civ. P. 6 and D.N.H.L Civ. R. 7.2(a), hereby moves this Honorable Court for an extension of time of thirty (30) days, up to and including May 7, 2020, to respond, by answer, motion or otherwise, to Plaintiffs' Amended Complaint. Good cause exists for granting this Motion, as Defendant needs additional time to investigate the allegations set forth in the Complaint and to formulate and prepare an appropriate response.

As grounds for this Motion, Defendant states the following:

1. On or about March 17, 2020, Defendant was served with the Complaint. A review of the docket also indicated that on March 16, 2020, Plaintiffs filed an Amended Complaint. Accordingly, the current deadline for Defendant to respond to the Amended Complaint is April 7, 2020. *See* Fed. R. Civ. P. 12(a)(1)(A)(ii).

2. Defense counsel needs additional time to investigate the allegations set forth in the Amended Complaint, meet with persons knowledgeable about this matter, and to formulate and

obtain and review documents in order to advise Defendant and to prepare an appropriate responsive pleading or motion. This has become more difficult as people are absent from the workplace and often unavailable during the current COVID-19 emergency.

3. On April 1, 2020, the undersigned counsel left a voicemail and sent an email to Plaintiffs' counsel to determine his position regarding the requested extension of time. As of the filing of this motion, the undersigned counsel has not received a response.

4. This is Defendant's first motion for an extension of the deadline to file a responsive pleading to the Amended Complaint.

5. This case is in its infancy. As such, granting this Motion will not result in undue delay or prejudice to the Court or any party.

WHEREFORE, Defendant Philadelphia Indemnity Insurance Company respectfully moves this Honorable Court for a thirty (30) day extension of time until May 7, 2020, to file a responsive pleading to Plaintiffs' Amended Complaint.

Respectfully submitted,

PHILADELPHIA INDEMNITY  
INSURANCE COMPANY,

By */s/ Dana M. Horton*

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April 3, 2020

**CERTIFICATION**

I hereby certify that on the 3<sup>rd</sup> day of April, 2020, I have caused the within motion to be filed with the Court via the ECF filing system. As such, this document will be electronically sent to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent those not receiving electronic notice.

*/s/ Dana M. Horton*  
Dana M. Horton, Esq.